

From: Becker, Jerry [mailto:jbecker@sjgov.org]

Sent: Tuesday, January 18, 2011 5:22 PM

To: Finger, Theresa

Subject: RE: Proposed Regulations: Trustworthy Electronic Document or Record Preservation

Hello Theresa,

San Joaquin County Information Systems Division has reviewed the Secretary of State's proposed language entitled, "Trustworthy Electronic Document or Record Preservation".

My organization has concerns regarding the proposed language and its potential fiscal and operational impact to San Joaquin County. Specifically:

- San Joaquin County has been utilizing an electronic imaging and document management system for over 10 years. The County has invested over \$2.5 million in this system. The system used by San Joaquin County does not meet the requirements established by the Secretary of State's proposed language. If enacted, San Joaquin County would not be able to comply with Sections 22620.4, 22620.5, and 22620.7 "six months after the effective date of these regulations" as the language proposes. Compliance with Sections 22620.4, 22620.5, and 22620.7 may in fact require the County to replace its existing imaging and document management system. Should the proposed regulations be adopted and applied to local government, San Joaquin County would be required to make sizable investments in dollars and staff time to upgrade (if possible) or replace its existing system to be compliant with the new regulations.
- The proposed regulation requiring use of a PDF-A file format will be a costly requirement for San Joaquin County. To comply with the PDF-A standard will require all users to have Adobe software installed on their computer at a cost of \$264 per user (including software and labor). The system currently used by the County utilizes a TIF file format to deliver advanced functionality to our customers.

Given the tremendous expense associated with meeting the requirements of these proposed regulations, San Joaquin County Information Systems Division respectfully recommends that the proposed language be modified to apply only to imaging and document management systems purchased AFTER the date the new regulations are adopted.

Thank you for the opportunity to comment. Please do not hesitate to contact me if you have any question on this matter.

Jerry

Jerry Becker

Director

Information Systems Division

County of San Joaquin

(209)468-3960

*Ingenuity – Commitment – Teamwork
Expanding Possibilities... Creating Solutions*

COUNTY DISCLAIMER

This email and any attachments may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments) by other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments.